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May 26, 2023

VIA ECF

The Honorable Sarah L. Cave
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Paul Phillips, et. al. v. The City of New York, et. al., 21 Civ. 8149
(ALC)(SLC)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendant City of New York in the above referenced matter. We write with the consent of plaintiffs' counsel to respectfully request that the discovery conference scheduled for May 31, 2023 at noon be adjourned. The reason for the request is that I was previously scheduled for a fully day deposition in three consolidated matters, see e.g. Bell v. City of New York, et. al., 22 Civ. 3251 (EDNY), for May 31st, which involves numerous counsel, thus making the deposition difficult to reschedule. Both Mx. Green and I are available for the conference herein on June 1 or 2 of next week if the Court has availability.

This is the first such request.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman
Mark D. Zuckerman

cc: All counsel (via ECF)

